

22-C-07110-S4

12/8/2022 3:42 PM
TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION 22-C-07110-S4
NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Alvin L. Stanley
24 Cactus Circle
Hazelhurst, GA 31539

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.
8th day of December, 2022

Tiana P. Garner
Clerk of State Court

By _____
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

22-C-07110-S4

12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION
NUMBER: _____

22-C-07110-S4

PLAINTIFF

VS.

DEFENDANT

Kiara Cain
114 ½ South Baker Street
Glennville, GA 30427

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.
8th day of December, 2022

Tiana P. Garner
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By _____
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12/8/2022 3:42 PM
TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION **22-C-07110-S4**
NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Wade Damron, Director Risk Management Services Division
Georgia Department of Administrative Services
200 Piedmont Avenue SE, Suite 1220 West Tower
Atlanta, GA 30334

SUMMONS

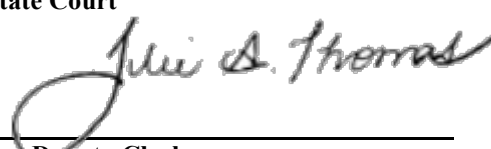
TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

Tiana P. Garner
Clerk of State Court

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TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION
NUMBER: 22-C-07110-S4

PLAINTIFF

VS.

DEFENDANT

Angela Fashant
122 3rd Avenue West
Reidsville, GA 30453

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 8th day of December, 2022.

Tiana P. Garner
Clerk of State Court

By Julie A. Thomas
Deputy Clerk

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TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

Heather Flowers
485 Regency Road
Vidalia, GA 30474

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

Tiana P. Garner
Clerk of State Court

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TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Marjorie Glover
1421 Peachtree Road
Reidsville, GA 30453

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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Tiana P. Garner
Clerk of State Court

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12/8/2022 3:42 PM
TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION
NUMBER: 22-C-07110-S4

PLAINTIFF

VS.

DEFENDANT

Vikki Irwin
25 1st Avenue South
Reidsville, GA 30453

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

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12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Shayla McLain
93 3rd Avenue West
Reidsville, GA 30453

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

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Clerk of State Court

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TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION
NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Cory Osborne
98 Oak Avenue
Reidsville, GA 30453

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

Tiana P. Garner
Clerk of State Court

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12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Securus Technologies, LLC
c/o CT Corporation System, Registered Agent
289 S. Culver Street
Lawrenceville, GA 30046

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.

**Tiana P. Garner
Clerk of State Court**

**By _____
Deputy Clerk**

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TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Alyssa Singer
2096 GA Highway 192 North
Midville GA 30441-4502

SUMMONS

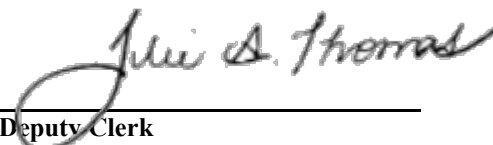
TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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Tiana P. Garner
Clerk of State Court

By  _____
Deputy Clerk

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TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

DEFENDANTChris Tarver
145 Peachtree Street
Swainsboro, GA 30401**SUMMONS****TO THE ABOVE NAMED DEFENDANT:**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.

8th day of December, 2022

Tiana P. Garner
Clerk of State Court

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12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION **22-C-07110-S4**

NUMBER: _____

PLAINTIFF

VS.

Dataonline LLC d/b/a Anova
c/o Robert Barnacle, Registered Agent
210 South Street
New Providence, NJ 07974

DEFENDANT

SUMMONS

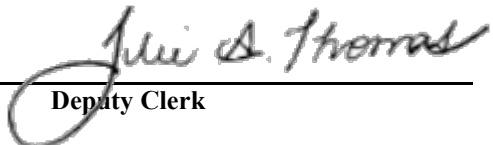
TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

Tiana P. Garner
Clerk of State Court

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12/8/2022 3:42 PM
TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Trevonza Bobbitt
427 1st Avenue South
Reidsville, GA 30453

SUMMONS

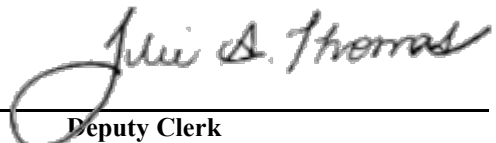
TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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Tiana P. Garner
Clerk of State Court

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22-C-07110-S4

12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION 22-C-07110-S4

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Nikila Brack
305 Hodges Circle
Statesboro, GA 30458

SUMMONS

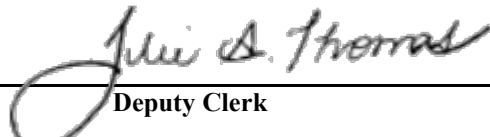
TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

Tiana P. Garner
Clerk of State Court

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22-C-07110-S4**12/8/2022 3:42 PM**
TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION
NUMBER: _____**22-C-07110-S4**_____

PLAINTIFF

VS.

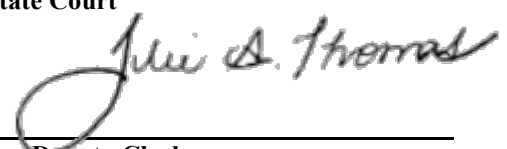
DEFENDANTBobby Figueroa
554 Oak Ridge Road
Soperton, GA 30457**SUMMONS****TO THE ABOVE NAMED DEFENDANT:**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.

8th day of December, 2022

Tiana P. Garner
Clerk of State CourtBy  _____
Deputy Clerk**INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.**

22-C-07110-S4

12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Barnard Florence
12800 Burkhalter Road
Statesboro, GA 30461

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.

8th day of December, 2022

Tiana P. Garner
Clerk of State Court

By _____


Deputy Clerk

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22-C-07110-S4

12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION 22-C-07110-S4
NUMBER: _____

PLAINTIFF

VS.

Slobodan Popovic
427 Auburn Road
Glennville, GA 30427

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____, 20____.
8th day of December, 2022

Tiana P. Garner
Clerk of State Court

By Julie A. Thomas
Deputy Clerk

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22-C-07110-S4

12/8/2022 3:42 PM
TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION 22-C-07110-S4
NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Timothy C. Ward, Commissioner
Georgia Department of Corrections, Headquarters
7 MLK Jr. Drive, Suite 543
Atlanta, GA 30334

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

Tiana P. Garner
Clerk of State Court

By _____
Deputy Clerk

Julie A. Thomas

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22-C-07110-S4

12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

Independent Technologies, LLC d/b/a Wintel Phones
c/o Michael Kivett, Registered Agent
Valentine O'Toole LLP
11240 Davenport Street
Omaha, NE 68154

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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8th day of December, 2022

Tiana P. Garner
Clerk of State Court

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22-C-07110-S4**12/8/2022 3:42 PM**

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

22-C-07110-S4

CIVIL ACTION

NUMBER: _____

PLAINTIFF

VS.

Steve Griner
111 Lakeview Drive
Sandersville, GA 31082_____
DEFENDANT

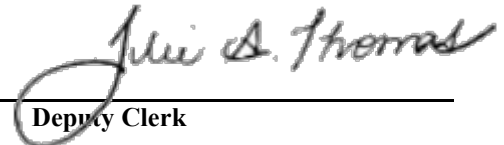
SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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Tiana P. Garner
Clerk of State CourtBy _____
Deputy Clerk

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22-C-07110-S4

12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION **22-C-07110-S4**

NUMBER: _____

PLAINTIFF

VS.

Edward Rooks
969 Hatch Parkway North
Baxley, GA 31513

DEFENDANT

SUMMONS

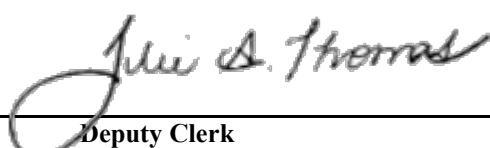
TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

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Clerk of State Court

By  _____
Deputy Clerk

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22-C-07110-S4

12/9/2022 9:11 AM

TIANA P. GARNER, CLERK

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

CIVIL ACTION **22-C-07110-S4**

NUMBER: _____

PLAINTIFF

VS.

DEFENDANT

Securus Technologies, LLC
c/o CT Corporation System, Registered Agent
289 S. Culver Street
Lawrenceville, GA 30046

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This **9TH** day of _____, 20____.

Tiana P. Garner
Clerk of State Court

By  Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

No. _____

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

capacity,)

MARJORIE GLOVER,)

Individually and in her official)

capacity,)

CORY OSBORNE,)
Individually and in his official)
capacity,)
KIARA CAIN,)
Individually and in her official)
capacity,)
CHRIS TARVER,)
Individually and in his official)
capacity,)
SHAYLA McLAIN,)
Individually and in her official)
capacity,)
BARNARD FLORENCE,)
Individually and in his official)
capacity,)
ALYSSA SINGER,)
Individually and in her official)
capacity,)
CHRISTOPHER L. BURKHALTER,)
Individually and in his official)
capacity,)
HEATHER FLOWERS,)
Individually and in her official)
capacity,)
EDWARD ROOKS,)
Individually and in his official)
capacity,)
STEVE GRINER,)
Individually and in his official)
capacity,)
NIKILA BRACK,)
Individually and in her official)
capacity,)
ANGELA FASHANT,)
Individually and in her official)
capacity,)
SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

COMPLAINT FOR DAMAGES

COMES NOW plaintiff, Edward Lewis Stanley, and shows this Court as follows:

PARTIES, JURISDICTION & VENUE

1. Plaintiff Edward Lewis Stanley is incarcerated at the Augusta Medical Prison in Grovetown, Georgia, and all answers, responses to discovery, and pleadings may be served on his counsel of record. Jurisdiction and venue are proper in this Court.

2. Defendant Securus Technologies, LLC (hereinafter “Securus”), is a Delaware Limited Liability Company and it may be served with the complaint, summons, discovery, and all pleadings by service on its Registered Agent as follows:

Securus Technologies, LLC
c/o CT Corporation System, Registered Agent
289 S. Culver Street
Lawrenceville, GA 30046

Jurisdiction and venue are proper in this Court.

3. Defendant Alvin Stanley resides and is domiciled in Georgia, Jeff Davis County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Alvin Stanley
24 Cactus Circle
Hazelhurst, GA 31539

Jurisdiction and venue are proper in this Court.

4. Defendant Independent Technologies, LLC d/b/a Wintel Phones (hereinafter “Wintel”) is a Nebraska Limited liability company and it may be served with plaintiff’s complaint and summons as follows:

Independent Technologies, LLC d/b/a Wintel Phones
c/o Michael Kivett, Registered Agent
Walentine O’Toole LLP
11240 Davenport Street
Omaha, NE 68154

Jurisdiction and venue are proper in this Court.

5. Defendant Dataonline LLC d/b/a Anova (hereinafter “Wintel”) is the sole shareholder of defendant Independent Technologies, LLC d/b/a Wintel and is a New Jersey Limited Liability Company, and it may be served with a copy of plaintiffs’ complaint and summons by service as follows:

Dataonline LLC d/b/a Anova
c/o Robert Barnacle, Registered Agent
210 South Street
New Providence, NJ 07974

Jurisdiction and venue are proper in this Court.

6. The Georgia Department of Corrections (hereinafter “DOC”) may be served with a copy of this complaint and summons as follows:

Timothy C. Ward, Commissioner
Georgia Department of Corrections, Headquarters
7 MLK Jr. Drive, Suite 543
Atlanta, GA 30334

and

Wade Damron, Director Risk Management Services Division
Georgia Department of Administrative Services
200 Piedmont Avenue SE, Suite 1220 West Tower
Atlanta, GA 30334

Jurisdiction and venue are proper in this Court.

7. Plaintiff is also providing a copy of the complaint and summons showing the date of which this complaint was filed to Attorney General Christopher Carr by Certified Return Receipt Mail, Return Receipt Requested as required by O.C.G.A § 50-21-35 to his address as follows:

Christopher M. Carr, Attorney General
State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334

Jurisdiction and venue are proper in this court.

8. Attached is a certificate that counsel is providing a copy of the complaint and summons with a stamped filed date from the Court to comply with O.C.G.A § 50-21-35. *Exhibit 1, Affidavit of Certificate of Compliance.*

9. Attached is a copy of the *ante litem* notice provided to the Georgia Department of Corrections, the Department of Administrative Services Risk Management Division and the Georgia Attorney General, as required under the Georgia Tort Claims Act. Exhibit 2, *Ante Litem Notice & Proof of Overnight Mailings*.

10. All conditions precedent to filing this lawsuit have been met, and jurisdiction and venue are proper in this Court over all party defendants.

11. Defendant Timothy Ward resides and is domiciled in Georgia, Baldwin County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Timothy C. Ward
300 Southern Walk Drive
Milledgeville, GA 31061

Jurisdiction and venue are proper in this Court.

12. Defendant Trevonza Bobbitt resides and is domiciled in Georgia, Tattnall County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Trevonza Bobbitt
427 1st Avenue South
Reidsville, GA 30453

Jurisdiction and venue are proper in this Court.

13. Defendant Vikki Irwin, Individually, resides and is domiciled in Georgia, Tattnall County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Vikki Irwin
25 1st Avenue South
Reidsville, GA 30453

Jurisdiction and venue are proper in this Court.

14. Defendant Marjorie Glover, Individually, resides and is domiciled in Georgia, Tattnall County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Marjorie Glover
1421 Peachtree Road
Reidsville, GA 30453

Jurisdiction and venue are proper in this Court.

15. Defendant Cory Osborne, Individually, resides and is domiciled in Georgia, Tattnall County, and he may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Cory Osborne
98 Oak Avenue
Reidsville, GA 30453

Jurisdiction and venue are proper in this Court.

16. Defendant Kiara Cain, Individually, resides and is domiciled in Georgia, Tattnall County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Kiara Cain
114 ½ South Baker Street
Glennville, GA 30427

Jurisdiction and venue are proper in this Court.

17. Defendant Chris Tarver, Individually, resides and is domiciled in Georgia, Emanuel County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Chris Tarver
145 Peachtree Street
Swainsboro, GA 30401

Jurisdiction and venue are proper in this Court.

18. Defendant Shayla McLain, Individually, resides and is domiciled in Georgia, Tattnall County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Shayla McLain
93 3rd Avenue West
Reidsville, GA 30453

Jurisdiction and venue are proper in this Court.

19. Defendant Barnard Florence, Individually, resides and is domiciled in Georgia, Bulloch County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Barnard Florence
12800 Burkhalter Road
Statesboro, GA 30461

Jurisdiction and venue are proper in this Court.

20. Defendant Alyssa Singer, Individually, resides and is domiciled in Georgia, Emanuel County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Alyssa Singer
2096 GA Highway 192 North
Midville, GA 30441-4502

Jurisdiction and venue are proper in this Court.

21. Defendant Christopher L. Burkhalter, Individually, resides and is domiciled in Georgia, Chatham County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Christopher L. Burkhalter
2606 Marshall Avenue
Savannah, GA 31405

Jurisdiction and venue are proper in this Court.

22. Defendant Heather Flowers, Individually, resides and is domiciled in Georgia, Toombs County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Heather Flowers
485 Regency Road
Vidalia, GA 30474

Jurisdiction and venue are proper in this Court.

23. Defendant Edward Rooks, Individually, resides and is domiciled in Georgia, Appling County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Edward Rooks
969 Hatch Parkway North
Baxley, GA 31513

Jurisdiction and venue are proper in this Court.

24. Defendant Steve Griner, Individually, resides and is domiciled in Georgia, Washington County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Steve Griner
111 Lakeview Drive
Sandersville, GA 31082

Jurisdiction and venue are proper in this Court.

25. Defendant Nikila Brack, Individually, resides and is domiciled in Georgia, Bulloch County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Nikila Brack
305 Hodges Circle
Statesboro, GA 30458

Jurisdiction and venue are proper in this Court.

26. Defendant Angela Fashant, Individually, resides and is domiciled in Georgia, Tattnall County, and she may be served with a copy of the Complaint and Summons at her personal residence and domicile as follows:

Angela Fashant
122 3rd Avenue West
Reidsville, GA 30453

Jurisdiction and venue are proper in this Court.

27. Defendant Slobodan Popovic, Individually, resides and is domiciled in Georgia, Tattnall County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Slobodan Popovic
427 Auburn Road
Glennville, GA 30427

Jurisdiction and venue are proper in this Court.

28. Defendant Bobby Figueroa, Individually, resides and is domiciled in Georgia, Treutlen County, and he may be served with a copy of the Complaint and Summons at his personal residence and domicile as follows:

Bobby Figueroa
554 Oak Ridge Road
Soperton, GA 30457

Jurisdiction and venue are proper in this Court.

29. At all times alleged in this complaint, the individual defendants employed by the Department of Corrections were acting in their individual capacities and their official capacities under color of law for the Department of Corrections.

30. No individual defendant is sued for negligence under the Georgia Tort Claims Act, but only for the violation of plaintiff Stanley's civil rights protected by the Fourth, Fifth, Fourteenth and Eighth Amendments of the U.S. Constitution. *See* 42 U.S.C. § 1983 et seq.

31. If discovery shows that additional individual or entity defendants should be added to this complaint, plaintiffs will move to substitute for the John Doe defendants or to add them as parties with permission of this Court.

FACTUAL ALLEGATIONS

32. On December 8, 2020 plaintiff Stanley was an inmate at Georgia State Prison in Reidsville, GA (hereinafter "GSP").

33. Stanley was in Tier II Lockdown in Dormitory K-2, Cell 1 at the prison that evening.

34. Stanley requested to use the Securus phone after dinner that evening and a guard rolled or pushed the cart to his cell door and placed the phone on a purple cloth over the metal tray/ledge into his cell so that he could use the phone:



Exhibit 3, K-2 Cell 1 Photograph Inset, Double Click on Photo to Enlarge Its Size.

35. The Securus phone had a Wintel Phone, Model 7010SS Mini Stainless Steel, mounted on what appears to be a “dolly” or moving cart. *Id.*

36. Securus provided the phone, cart, wiring, maintained the phone, and agreed to be responsible for all components of the above phone and cabling

through its written Agreement with the Georgia Department of Corrections, including both sharing revenue for calls, etc. generated from inmate phone services.

37. Defendant Wintel manufactured the phone and provided it to the State of Georgia, a prior prison phone services vendor, or Securus prior to December 8, 2020.

38. When Stanley was finished using the phone he went to return the receiver to the metal ledge on his cell covered by the purple cloth or rag, and the phone or cord caused an arc fire between the metal door and the phone or cabling igniting Stanley's sweatshirt, sweatpants, and long johns he was wearing severely burning him, as described more fully below.

39. The inmate clothing provided to Stanley was manufactured by the State of Georgia by its Prison Labor Garment or Clothing Factory in Sandersville, GA.

40. The clothing provided by the DOC was not properly manufactured to industry standards regarding fire retardance accepted in the clothing, garment industry.

41. There was no warning attached to the clothing or any verbal warning given to Stanley, who is illiterate and has an IQ of less than 75.

42. At approximately 1740 hours on December 8, 2020 defendant Cain was working in the KSouth Control Booth at GSP when she observed smoke in the K2 dorm building.

43. Cain wrote that she immediately informed defendant Glover in Main Control because there was not a guard in K2 to check on the source of the smoke, and Glover said “OK.”

44. Glover was the Captain in charge of the day shift, and defendant Irwin was the Duty Officer on duty for the day shift.

45. Defendant Cain also told or advised defendant Burkhalter when he arrived for the night shift at approximately 1800 hours of the fire or smoke issue in the K2 Dorm.

46. Cain also told defendant Flowers, the KSouth Control Booth night shift officer, about the fire and or smoke in the K2 Dorm when Flowers arrived at approximately 1820 hours to relieve Cain from her duty posting and before Cain left for the evening.

47. Neither Cain nor Glover checked on or investigated the source of the smoke in the K2 Dorm before leaving for the evening when their day shift ended, nor did Glover as the Shift Captain on duty inform defendant Osborne or other supervisor on the Night Shift that there was a possible fire or smoke problem in the

K2 Dorm, nor did they send a guard to investigate it immediately at 1740 hours when they first were aware of the smoke problem in the K2 Dorm.

48. When defendant Burkhalter came on duty and he became aware of the smoke in the K2 Dorm he did not investigate the matter or report any smoke or fire problem to his shift supervisor defendant Osborne.

49. Defendant Flowers did not report the smoke or fire in the K2 Dorm to defendant Osborne when she came on duty, nor did she ask someone else to, nor did she personally investigate the fire or smoke in the K2 Dorm.

50. At 1900 hours, approximately one to two hours after Stanley was severely burned in his cell, defendants Rooks and Burkhalter conducted a “count” in the K2 Dorm and saw Stanley injured in his cell, and Stanley told them he was burned by the Securus prison phone.

51. Shockingly neither Burkhalter nor Rooks attempted to assess Stanley’s injuries or the severity of his burns, nor did they report the injuries to Stanley to their supervisors nor medical staff, they left him in his cell.

52. The smell of smoke and burnt flesh was evident and present in the K2 Dorm near Stanley’s cell that evening.

53. Two hours later, after the 2100 hour count, defendant Rooks contacted the medical personnel and reported the injuries to Stanley according to Burkhalter.

54. After 2200 hours, more than three and ½ hours after Stanley was burned in his cell, defendant McLain was escorting Nurse Danielle McGuire on the evening insulin duty for diabetic inmates who needed insulin injections in the K2 Dorm.

55. McLain wrote that she was advised to look in Stanley's cell for some type of "alleged burn," and she saw him sitting on the side of his bed complaining that the state phone had burned him.

56. McLain wrote that she then notified defendant Osborne or her OIC and advised the counting officers to bring Stanley to be checked by the prison medical staff at the infirmary.

57. Nurse McGuire wrote that Stanley was sitting on the side of his bed "shaking" and he advised her too that the "phone burned me."

58. Nurse McGuire advised security that Stanley needed to come to medical "now," and with orders to alert EMS, start an IV, due to the grave condition in which she found Stanley in his cell as shown in the photographs inset, after he was taken to the prison medical infirmary:



Exhibit 4, Stanley photograph, Double Click on Photo to Enlarge Its Size.



Exhibit 5, Stanley Photograph, Double Click on Photo to Enlarge Its Size.



Exhibit 6, Stanley Photograph, Double Click on Photo to Enlarge Its Size.



Exhibit 7, Stanley Photograph, Double Click on Photo to Enlarge Its Size.



Exhibit 8, Stanley Photograph, Double Click on Photo to Enlarge Its Size.

59. When defendant Osborne spoke with Stanley in the infirmary at the prison he stated to Osborne “the inmate phone sparked and caught my clothes on fire!”

60. Tattnell EMS personnel arrived at the prison infirmary at approximately 2239 hours, more than 5 and ½ hours after Stanley was burned in his cell, and they noted that Stanley had severe burns to more than 90% of his body.

61. Stanley told EMS personnel that he was using the phone and when he was done, he laid it down onto the metal flap of his door and it caught his clothes on fire and he could not get them off before it burned his body.

62. Tattnall EMS personnel observed severe burns to his body including his arm pits, penis, testicles, hand, legs, back, groin, buttocks, etc. and that Stanley was in obvious pain, shock, and shivering.

63. Tattnall EMS personnel administered fentanyl and versed to control Stanley's pain for his severe burns.

64. Tattnall EMS personnel were ready to transport him to the Candler Hospital in Tattnall County for a life flight to Augusta, but were further delayed approximately 18 minutes due to the prison staff not having officers available to escort Stanley to the EMS vehicle and ride to the helicopter pad at the hospital.

65. Tattnall EMS personnel were told by the prison staff that Stanley was burned between 1700 and 1800 hours in his cell, but that he was not brought to the prison medical infirmary unit until 2224 hours—five and ½ to four and ½ hours after he was burned in his cell.

66. Inmates in the K2 Dorm that evening will testify that they were screaming, yelling that someone was on fire and burning in their cell for more than five hours that evening trying to get the attention of the guards.

67. Stanley was life flighted to the Augusta Medical Center where he was treated for his burns for several months, including two amputations of his left leg, one to his right leg, and treatment for the horrific burns and resulting scarring that has left severely, physically injured and damaged for the rest of his life as shown in the photographs below:



Exhibit 9, Stanley Photograph, Double Click on Photo to Enlarge Its Size.



Exhibit 10, Stanley Photograph, Double Click on Photo to Enlarge Its Size.



Exhibit 11, Stanley Photograph, Double Click on Photo to Enlarge Its Size.

68. Stanley was permanently and horrifically burned in his cell, due to no fault of his own, leaving him without legs above both knees, and medical bills during his treatment that exceed \$8,000,000.00 (eight million dollars).

69. Stanley will face a lifetime of ongoing medical care and treatment that plaintiff believes will exceed \$10,000,000 due to the severity of his injuries.

70. Stanley will suffer physical pain, scarring, inability to walk and enjoy life as he did before this incident, and mental pain and suffering from his injuries for the rest of his life.

71. Stanley was not negligent in any regards as it relates to the fire in his cell from the phone or the burn injuries he suffered that evening.

Section I. Claims Against Securus, Its Employee Alvin Stanley, and Wintel

Subsection I(a) Negligence by Securus And Its Employees

72. All prior allegations of this complaint are adopted and incorporated in this section of the complaint.

73. Securus and its employees including Alvin Stanley were negligent in inspecting and maintaining the phone cart, wiring, and Wintel handset it provided to the DOC and Alvin Stanley to use on December 8, 2020, and it and its employees including Stanley failed to properly maintain and prevent that equipment from arcing with the metal doors in the K2 Dorm at GSP that evening and prior to that evening.

74. Securus was negligent in failing to warn the DOC or Stanley regarding possible arcing from their cart, handset, wiring, and cabling it provided to inmates for use on the evening of December 8, 2020 and prior to that date.

75. Securus knew or should have known that there was a significant risk of its phone systems as configured by it arcing or causing shocks or fires to inmates using those phones through metal doors at the GSP prison on December 8, 2020 and prior to that dates.

76. Securus was negligent and negligent per se in hiring, supervising, training and retaining its employees including Alvin Stanley as its employee to service phones at prisons in Georgia including GSP, and it is vicariously liable under the doctrine of *respondeat superior* and interpreting caselaw for Stanley's injuries and damages.

77. The Securus defendants' negligence and negligence per se is the sole or a contributing proximate cause of Stanley's personal injuries and damages.

78. Plaintiff demands judgment against the Securus defendants for his claims set forth in this complaint for damages.

Subsection I(b) Strict Liability & Negligent Failure to Warn for the Wintel Defendants

79. The Wintel defendants are strictly liable under Georgia law for its phones, including the model identified in this complaint, arcing or coming into contact with metal doors in prisons, to whom Wintel targets as customers for its

phones, causing an arc fire to his clothing and plaintiff's personal injuries and damages. See O.C.G.A. §§ 51-1-11 & 51-1-11.1.

80. The subject Wintel phone was defectively designed and manufactured without proper electrical shock, arcing safety mechanisms to prevent its phone sets from arcing with metal doors powered by electricity, so as to not shock or injure employees of the DOC and or inmates who might use or come into contact with their phones which were designed to be affixed to metal carts and used by inmates in prisons with metal doors controlled by electronic, electric door locks.

81. The Wintel defendants are strictly liable for any and all defects in its phones as the sole or contributing proximate cause of plaintiff's personal injuries and damages.

82. The user manual for the Wintel handset and manuals and technical bulletins it issued to its vendors and various state Department of Corrections it sells its phones to fails to provide any warning, advisory about arcing, fires, shocks, etc. to inmates or other persons and their clothing when using the Wintel defendants' phones.

83. Wintel regularly and knowingly sells phone handsets directly to Securus, the Georgia DOC, and prior vendors and failed to warn them or any inmate about an arc fire or shock warning associated with the use of its phones and handsets.

84. Wintel regularly conducts business in Georgia, including direct and indirect sales to its prisons for use by Georgia inmates.

85. Wintel was negligent in failing to warn of the arc fire, shock, and hazards associated with its handsets and carts provided by it or others.

86. The Wintel defendants' strict liability for its dangerous and defective phones, cabling and wiring and its negligence and negligence per se in failing to provide any or adequate warnings of the dangerousness of its phone sets is the sole or a contributing proximate cause of Stanley's personal injuries and damages.

87. Plaintiff demands judgment against the Securus and Wintel defendants for their unlawful conduct to be determined by a jury at trial.

88. The Securus and Wintel defendants' negligence and negligence per se is the sole or a contributing proximate cause of Stanley's personal injuries and damages.

Section II. Claims Against The Georgia Department of Corrections Under The Tort Claims Act

89. All prior allegations of this complaint are adopted and incorporated in this section of the complaint.

90. The DOC has waived its immunity for the negligence of its employees and agents as provided by the Georgia Tort Claims Act, and as set out in this complaint for damages, ante litem notice, and as discovery will further show in

support of this complaint. See O.C.G.A. § 50-21-20 et seq. and the ante litem notice attached to this complaint.

91. The DOC and its agents and employees including its warden, deputy warden, commissioner, and individual employees identified in this complaint were negligent and negligent per se in the design, supervision, and maintenance of electrical wiring and outlets, phone lines, phone equipment, hardware and software for phone, electrical and fire smoke detection equipment, for or through the Department of Corrections and by its phone system vendors for inmates, and other wiring and Code violations of state law and federal law, OSHA Requirements, Life Safety Code, NFPA 101, etc. and State Fire Marshall Requirements for inmates housed in prisons using prison provided phone, electrical devices and associated wiring and power sources, including smoke, fire alarms in inmate housing, sleeping and cell, cell door areas.

92. The DOC and its agents, employees, and contractors were negligent in the maintenance of the phones, phones, phone and electrical wiring connected to and in the vicinity of the phone equipment that Mr. Stanley was using with permission of prison personnel.

93. The DOC and its agents, employees, and contractors were Negligent and negligent per se in violating state and federal statutes, rules and regulations, *Ga. Comp. Rules & Regs.*, *Georgia Department of Corrections*, OSHA regulations,

Fire Marshal and Life Safety Code Regulations regarding the training and supervision by guards of inmates, failure to have fire, smoke alarms, routine ministerial inmate checks in their cells that allowed a phone system cart and devices to exist outside an inmate's cell after a fire for approximately four to six hours after his clothing was set alight from an arc fire, electrocution, fire in his cell and after guards were alerted to the fire in Stanley's cell by other inmates as early as 1742 hours on December 8, 2020.

94. The DOC and its agents, employees, and contractors were Negligent in failing to comply with Title II, of the American with Disabilities Act, for which the DOC has no immunity in law, to accommodate and provide care and a plan for Mr. Stanley following his severe burns and amputations of both legs above his knees.

95. The DOC and its agents, employees, and contractors were negligent, negligent per se and did negligently and intentionally inflict emotional distress on Stanley by the Department of Corrections and its guards and employees who were aware, or should have been aware of Stanley's burns and fire in his cell caused by the phone system in violation of DOC policies and procedures and federal and state laws and regulations regarding fire, smoke alarms and warning devices, inspection and supervision of inmates duties, obligations set out as ministerial duties in DOC policies and procedures and required by federal and state laws and regulations.

96. The DOC and its agents, employees, and contractors were negligent, grossly negligent, wilful, wanton, and intentionally failed to check on and to obtain medical care and treatment for Stanley after he was burned in his cell for more than six to seven hours after the fire caused by the phone and clothing, electrical wiring and equipment provided for his use in his cell.

97. This conduct by the individual DOC personnel on duty that evening and named in this complaint was cruel and unusual punishment at best.

98. The DOC and its agents, employees, and contractors are strictly liable under Georgia law for negligently designing and manufacturing clothing, selling and distributing to its inmates clothing it made at the DOC factory in Sandersville that does not meet flame, or fabric retardant characteristics were prevalent in the industry as a standard for clothing provided to human beings to wear. *See* O.C.G.A. § 51-1-11 & 51-1-11.1.

99. The DOC and its agents, employees, and contractors are liable for their negligence by prison personnel in sewing, altering, and making long johns or sleepwear for inmates from material provided or donated to the DOC without testing, or being aware of the dangerous flammability and danger of that material being made into human clothing, undergarments for inmates due to its high flammability characteristics.

100. The DOC and its agents, employees, and contractors are liable for their negligent failure to warn of the fire risk associated with the clothing the DOC provided and the fire risk from the phones provided to the inmates for their use by the DOC through Securus.

101. The DOC and its agents, employees, and contractors are liable for their negligent and negligent per se failures in training and supervising the prison guards and supervisory personnel whose duty it was to train, supervise guards and check on inmates on December 8, 2020 pursuant to prison policies and procedures, federal and state law rules and regulations, including in Building K2 in the cell where Stanley was housed that day prior to and after the fire in his cell, and his transfer by prison personnel after first discovering Stanley burned in his cell to the medical unit at the prison shortly before EMS personnel arrived at the prison medical unit at approximately 22:20 p.m. on December 8, 2020.

102. The DOC and its agents, employees, and contractors are liable for their negligent and negligent per se conduct of DOC personnel in assessing a mentally disabled inmate, providing him appropriate prison assignments and counseling to enable him to deal with a long prison term as a mentally, cognitively disabled inmate.

103. Plaintiff does not assert any claim against any individual employee of the DOC under the Georgia Tort Claims Act, but only against the DOC.

104. The DOC's wrongful and unlawful conduct set out above is a sole or contributing proximate cause of plaintiff's personal injuries and damages, both mental physical, including all past, present, and future damages and injuries arising out of the burns to Stanley on December 8, 2020.

105. Plaintiff demands judgment against the DOC for his claims set forth in this complaint for damages.

Section III. 49 U.S.C. § Claims Against The Georgia Department of Corrections Employees Sued in their Individual and Official Capacities— Defendants Ward, Bobbitt, Irwin, Figueroa, Glover, Osborne, Cain, McLain, Tarver, Florence, Singer, Burkhalter, Flowers, Rooks, Griner, Brack, Fashant, and Popovic

106. All prior allegations of this complaint are adopted and incorporated in this section of the complaint.

107. The DOC in the weeks, months, and years prior to this incident was critically understaffed with corrections officers at the GSP prison and as a result inmates were left unsupervised, inmates were attacked, beaten, killed, denied proper medical care and protection from other inmates under an official policy, use or custom of the DOC done with deliberate indifference by the individual defendants in their individual and official capacity in violation of the constitutional rights of Stanley protected by the Fourth, Fifth, Eighth and Fourteenth Amendments of the U.S. Constitution.

108. Defendant Ward as the Commissioner of the DOC; defendants Bobbitt and Irwin as the warden and deputy warden at GSP; Irwin and Figueroa as the senior officers on duty on December 8, 2022; defendants Glover and Osborne as the shift captains in charge; defendants Tarver, McLain, Flowers, Florence, as the shift sergeants and supervisors for the K2 Dorm; and Rooks and Burkhalter as the officers who were aware of a fire in the K2 Dorm as early as 1900 and 2100 hours but failed to get him proper medical care until after 2200 hours, were deliberately indifferent, and acted wilfully, wantonly and with conscious indifference to the consequences directed toward Stanley in violation of his constitutionally protected rights.

109. Defendant Cain was working in the control booth at approximately 1740 hours and noticed smoke coming from a fire at the K2 Dorm and despite warning her supervisor defendant Glover of the smoke and fire in that dorm, neither Glover nor Cain alerted any fire or EMS personnel or other guards to assess the fire in that dorm in deliberate, callous indifference to the constitutional rights of Stanley who was set ablaze in his cell prior to 1740 hours.

110. Defendants Cain and Glover failed to inform, tell defendant Osborne of the fire when he came on duty by Cain did tell defendants Burkhalter and Flowers at the shift change of the smoke and fire in the K2 Dorm.

111. Defendants Burkhalter, Rooks, Flowers, and all night-shift officers were deliberately indifferent and failed to investigate the fire or smoke in the K2 Dorm from 1800 hours until well after 1900 hours when they first discovered Stanley injured in his cell.

112. Defendants Rooks and Burkhalter intentionally, callously and with deliberate indifference ignored Stanley's obvious dire medical condition naked and burned extensively in his cell from 1900 hours until they finally informed defendant McLain of the "alleged" injury to Stanley in his cell after 2100 hours and between 2215 hours that evening.

113. Only when Nurse McGuire, accompanying McLain on the evening insulin injection routine for other inmates, did McGuire first assess and get Burkhalter and Rooks to transfer Stanley to the prison infirmary for medical treatment and transport out of the prison.

114. The prison officers named in this complaint including Osborne as the shift captain, Figueroa as the chief on duty officer, the sergeants and supervisory lieutenants named in this complaint, control and operator personnel named, failed to act on the actual knowledge of the DOC personnel including Flowers, Glover, Cain, Glover, Osborne, Burkhalter, Rooks, and their coworkers regarding the serious burns and injuries to Stanley in Cell 1 in Dorm K2 at the GSP prison as the source of the fire and smoke reported at 1740 hours that evening.

115. The wilful, wanton, conscious and deliberate indifferent failure to investigate and provide timely medical treatment to a severely burned inmate is cruel, unusual, and despicable conduct for an inmate who sat in his cell from before 1740 hours until after 2200 hours before he was taken to the infirmary, left the prison in an EMS vehicle after 2240 hours, and endured a life flight, and subsequent months of painful grueling treatment from those injuries resulting in the amputation of both legs and the painful scarring shown in the photographs to this complaint.

116. The individual defendants' conduct in this section of the complaint violates the Fourth, Fifth, Eighth and Fourteenth Amendments of the U.S. Constitution and federal law, with deliberate indifference to Stanley's constitutional rights.

117. The conduct by these individual defendants was done with intentional, deliberate indifference, and was done wilfully, wantonly and with conscious indifference to the constitutional rights of Stanley violating his constitutional rights protected by 42 U.S.C. § 1983 et seq.

118. Defendants Ward, Bobbitt, Irwin, Figueroa, Glover and Osborne as supervisory personnel knew and had actual knowledge of the dire, dangerous understaffing at GSP on December 8th and acted with deliberate indifference to properly staff by overtime pay, additional officers, train, hire, and supervise

existing officers as to the importance to investigate reports of fire, smoke in any dorm including K2 to protect the safety of the inmates in their sole care and custody.

119. Defendants' Glover, Cain, Flowers, Burkhalter and Rooks intentional failure to immediately obtain medical treatment and care for Stanley and to investigate the fire, smoke in K2 and Stanley's circumstances in his locked cell shows intentional, wilful, wanton, and consciously indifferent conduct towards Stanley in violation of his constitutional rights protected in law, particularly given their actual knowledge of a fire, smoke in that dorm as early as 1740 hours.

120. Defendants' Glover, Cain, Flowers, Burkhalter and Rooks deliberate indifference to Stanley caused him to suffer unnecessary past, present, and future pain and suffering resulting in the loss of his property, his legs, and horrific scarring and psychological injuries to Stanley violating his rights set out in this complaint.

121. The supervisory personnel on duty at the shift change and afterwards including Irwin, Glover, Osborne, Figueroa and the entire chain of command on the evening shift including Osborne, Burkhalter, and Rooks to investigate the written entries in the log books and the oral reports of Cain to Glover, Burkhalter, Flowers and Rooks of the fire in K2 Dorm as early as 1700 hours, less than an hour after Stanley was first burned, shows deliberately indifferent, intentional, wilful,

wanton, and consciously indifferent conduct to the consequences and physical safety and rights of Edward Stanley.

122. The individual defendants' acts in concert or alone is a sole or contributing proximate cause of Stanley's personal injuries and damages.

123. Plaintiff demands judgment against these defendants at trial for the violation of his constitutional rights as pled in this Complaint.

Section IV. Attorneys Fees, Costs, and Punitive Damages Under O.C.G.A. §§ 13-6-11 and 51-12-5.1

124. All prior allegations of this complaint are adopted and incorporated in this section of the complaint.

125. The defendants' conduct, all defendants, shows a species of bad faith in the underlying event, stubborn litigiousness, and causing plaintiff unnecessary cost and expense as defined by O.C.G.A. §13-6-11 and interpreting case law entitling plaintiff to an award of his fees and costs to be determined by a jury at trial.

126. The conduct of DOC individual defendants who had actual knowledge of a fire in the K2 Dorm as early as 1740 hours and did nothing to investigate or render any medical care to Stanley—at the insistence of Nurse McGuire—until after 2200 hours shows a species of wilful, wanton, consciously indifferent conduct towards Stanley meriting the imposition of attorneys' fees and costs under Georgia law.

127. Plaintiff demands judgment against the defendants for his attorneys' fees and costs at trial as provided by O.C.G.A. § 13-6-11 and 9-11-68 if appropriate at any trial of this case.

128. Plaintiff demands judgment at trial against defendants Glover, Burkhalter, Flowers, Rooks, Osborne, McLain and other DOC individual defendants at trial who are shown to have actual knowledge of the fire in the K2 Dorm reported to them, the chain of command, and staff before or after the shift change between 1740 and 1800 hours, as provided by O.C.G.A. § 51-12-5.1.

129. Plaintiff demands judgment against the defendants identified in this section for punitive damages as the jury deems appropriate in its fair and enlightened conscience.

PRAYER FOR RELIEF:

WHEREFORE Plaintiff prays for judgment against the defendants and that they be granted the following relief:

(a) That service of process issue and Defendants be served with the Plaintiff's complaint and summons as provided by law;

(b) That Plaintiff have and recover an award of compensatory damages against Defendants including general and special damages to be determined by the jury at trial in its fair and enlightened conscience but in an amount not less than \$25,000,000.00;

(c) That Plaintiff have and recover an award of compensatory damages against Defendants including all general and special damages included in the verdict at trial, plus pre and post-judgment interest on said judgment, other damages in amounts to be proven at trial, and to have judgment entered thereon, but in an amount not less than \$25,000,000.00;

(d) That Plaintiff have and recover an award for expenses of litigation, including reasonable attorneys' fees, against Defendants, and have judgment entered thereon;

(e) That Plaintiff recover punitive damages against the specific Defendants identified in the Complaint at trial, in an amount the jury deems appropriate in its fair and enlightened conscience;

(f) That all costs be taxed against the Defendants;

(g) That Plaintiff have such other and further additional relief as the Court deems just and appropriate under the circumstances; and

(h) PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL CLAIMS, ISSUES, COUNTERCLAIMS, CROSS-CLAIMS, THIRD PARTY CLAIMS, OR ANY AMENDMENT THERETO TO THIS COMPLAINT FOR DAMAGES.

RESPECTFULLY SUBMITTED,

**COUNSEL FOR PLAINTIFF
EDWARD LEWIS STANLEY:**

By: /s/ Terry D. Jackson
TERRY D. JACKSON
Georgia Bar No. 386033



"We Know Trucks"
www.terryjacksonlaw.com

TERRY D. JACKSON, P.C.
600 Edgewood Avenue
Atlanta, Georgia 30312
(404) 216-5312 cell
(404) 659-2400 office
(404) 659-2414 fax
terry@terryjacksonlaw.com

EXHIBIT 1

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

No. _____

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

capacity,)

MARJORIE GLOVER,)

Individually and in her official)

capacity,)

CORY OSBORNE,)
Individually and in his official)
capacity,)
KIARA CAIN,)
Individually and in her official)
capacity,)
CHRIS TARVER,)
Individually and in his official)
capacity,)
SHAYLA McLAIN,)
Individually and in her official)
capacity,)
BARNARD FLORENCE,)
Individually and in his official)
capacity,)
ALYSSA SINGER,)
Individually and in her official)
capacity,)
CHRISTOPHER L. BURKHALTER,)
Individually and in his official)
capacity,)
HEATHER FLOWERS,)
Individually and in her official)
capacity,)
EDWARD ROOKS,)
Individually and in his official)
capacity,)
STEVE GRINER,)
Individually and in his official)
capacity,)
NIKILA BRACK,)
Individually and in her official)
capacity,)
ANGELA FASHANT,)
Individually and in her official)
capacity,)
SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

AFFIDAVIT AND CERTIFICATE OF COMPLIANCE
WITH O.C.G.A. § 50-21-35

Personally appeared before the undersigned officer duly authorized to administer oaths, Terry D. Jackson, who after first being duly sworn, states and deposes as follows:

1. My name is Terry Jackson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.

2. I have filed a Complaint against the Georgia Department of Corrections, and once it is stamped filed and returned to us by the e-filing system I will provide Attorney General Christopher Carr a copy of the same by Certified Return Receipt Mail as required by O.C.G.A. § 50-21-35.

3. The Complaint and Summons by certified mailing will be sent to the Attorney General at the following address:

The Honorable Christopher M. Carr, Attorney General
State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334

4. Once the Complaint and Summons is stamped and returned to Plaintiff's counsel, and a copy of the Complaint and Summons with the date filed thereon is sent to the Attorney General, I will file a Notice of Filing showing that the Attorney General was provided a copy of the Complaint and Summons as required by O.C.G.A. § 50-21-35.

FURTHER AFFIANT SAYETH NOT.


TERRY D. JACKSON

Sworn to and subscribed before me
this 8th day of December, 2022.



Notary Public
My Commission Expires: 10/11/2026



EXHIBIT 2



Terry D. Jackson, P.C.

Trial Lawyers

terry@terryjacksonlaw.com

November 16, 2021

**Via Federal Express No. 7752 0835 2878, Email wardt00@dcor.state.ga.us
& 1st Class U.S. Mail**

Timothy C. Ward, Commissioner
Georgia Department of Corrections, Headquarters
7 MLK Jr. Drive, Suite 543
Atlanta, GA 30334

**Via Federal Express No. 7752 0838 0503, Email wade.damron@doas.ga.gov
& 1st Class U.S. Mail**

Wade Damron, Director Risk Management Services Division
Georgia Department of Administrative Services
200 Piedmont Avenue, Suite 1208 West Tower
Atlanta, GA 30334

**Via Federal Express No. 7752 0843 0946, Email ccarr@law.ga.gov
& 1st Class U.S. Mail**

The Honorable Christopher M. Carr, Attorney General
State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334

Ante Litem Notice Pursuant to the Georgia Tort Claims Act, O.C.G.A. § 50-21-26

Re: *Claimant:* Edward Lewis Stanley

Date: December 8, 2020, Approximately 13:00 to 22:35 hours
1 p.m. to 10:35 p.m. (See Exhibit 1, Tattnall County EMS
Trip Report)

Location: Georgia State Prison a/k/a Reidsville Prison
Reidsville, GA, Tattnall County
Building K2

Amount Demanded: \$1,000,000.00 (One Million Dollars)

Timothy C. Ward, Commissioner
Wade Damron, Director Risk Management Services Division
The Honorable Christopher M. Carr, Attorney General
November 16, 2021
Page 2 of 6

Dear Comm. Ward, Mr. Damron & Atty. Gen. Carr:

The purpose of this letter is to perfect a required statutory ante litem notice as required by the Georgia Tort Claims Act at O.C.G.A. § 50-21-26.

This notice of claim, *ante litem* notice, under O.C.G.A. § 50-21-26 states to the extent of the claimant's knowledge and belief and as may be practicable under the circumstances--due to Stanley's incarceration and his inability to read, write, and communicate due to his developmental, cognitive mental disabilities--and the limited ability of his counsel to communicate with Mr. Stanley due to his developmental and cognitive limitations, the following information as set out below.

Description of the Incident Causing Injuries:

On December 8, 2020, at Georgia State Prison a/k/a Reidsville between 13:00 and 18:00 hours, 1-6 p.m., Stanley was an inmate in Building K-2 where he was locked in his cell, believed to be Cell 1. A guard pulled over to him a Securus, DOC provided telephone on a cart, hardwired into the wall, and allowed Stanley to use it. The guard then left the area, and did not return for at least six hours, at approximately 22:00 based on information currently available to Mr. Stanley's counsel.

When Stanley was through using the phone, he laid the Securus, DOC provided phone on the metal flap of his cell door, the cabling, wiring and phone arced (electrical arc) and caught his clothing on fire. The fire caught Stanley's jump suit and the long johns under it on fire and he could not get his clothing off his body before it burnt his clothing and his body. Stanley suffered burns to approximately 90% of his body.

Reidsville Prison staff told the EMS personnel it suspected that the incident happened in Stanley's cell between 16:00 and 18:00 hours, but he was not brought to the medical unit at Reidsville Prison until 22:24 hours, approximately 18 minutes before Tattnell EMS personnel arrived at 22:42 p.m. at Stanley's side to render care to him and transfer him to the Reidsville Prison air flight helicopter dispatched to pick up Stanley and transport him to Augusta University Medical Center and its Burn Treatment Center.

In the days, weeks and months in 2021 following Stanley's transfer by air helicopter from Reidsville to Augusta, the decision was made by his treating physicians to amputate both of Stanley's legs. Stanley's medical treatment in Augusta is ongoing including at the Augusta Medical Prison in Augusta, GA where Stanley is currently incarcerated.

Stanley continues to suffer severe physical and mental pain from his burn injuries, including nerve pain, searing pain, and phantom leg pain. Stanley's pain and ability to comprehend what has happened to him is limited by his developmental and cognitive disabilities.

Timothy C. Ward, Commissioner
Wade Damron, Director Risk Management Services Division
The Honorable Christopher M. Carr, Attorney General
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Page 3 of 6

Stanley's genitals including his penis were severely burned by the highly flammable undergarment he was provided by the prison as long johns, and his ability to use the bathroom and perform routine tasks is severely limited, compromised due to his injuries and his confinement to a wheelchair. Stanley faces future ongoing medical treatment, surgeries for his injuries arising out of this incident on December 8, 2020.

To date Stanley's medical bills exceed \$8,000,000 as billed by the Burn Center in Augusta. See Exhibit 1, Tattnall County EMS report; and Exhibit 2, Joseph M. Still Burn Center Certified Billing Records.

The medical prison has stopped all physical therapy for Mr. Stanley who is in constant pain, and all medications for pain have been stopped by the medical prison.

No prosthetics, etc. to comply with Title II of ADA, for which there is no immunity, have been made for this mentally and physically disabled prisoner.

This ante litem notice provided to you complies with Georgia Tort Claims Act at O.C.G.A. 50-21-26(a)(5)(A-F) including:

(A) The name of the state government entity, the acts or omissions of which are asserted as the basis of the claim:

Georgia Department of Corrections.

(B) The time of the transaction or occurrence out of which the loss arose:

December 8, 2020, between 13:00 and 22:35 hours.

(C) The place of the transaction or occurrence:

Georgia State Prison a/k/a Reidsville Prison
Reidsville, GA, Tattnall County
Building K2

(D) The nature of the loss suffered:

Severe second and third degree burns of the majority of Stanley's body, 90% per his records, bodily injuries, amputation of both legs, mental and physical pain and suffering, ability to enjoy life, ability to labor and earn, all elements of general damages to which Mr. Stanley is entitled to recover under Georgia law. Future lost income, wages due to Stanley's burns and amputation of his legs. See O.C.G.A. § 51-12-1 et seq. and interpreting case law for direct, consequential, general and special damages flowing from Stanley's injuries that he is entitled to recover under Georgia law, including past, present and future medical bills and expenses from his burns and amputations.

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(E) The amount of the loss claimed:

\$1,000,000.00 (one million dollars, U.S.) to Mr. Stanley for his personal bodily injuries;
See O.C.G.A. § 50-21-29(b)(1).

Stanley will also seek attorneys' fees and costs pursuant to O.C.G.A. §§ 13-6-11, 9-11-68 and 42 U.S.C. §§ 1981, 1988 et seq. that will likely exceed the Georgia Tort Claims Act statutory maximum \$1,000,000.00 made in this ante litem notice amount above, for an additional amount at any trial of this case to be determined by a jury in its fair and enlightened conscience but in an amount not less than \$1,000,000.00 in attorneys' fees and costs if this \$1,000,000.00 demand is not accepted.

(F) The acts or omissions which caused the loss.

Negligent and negligent per se failures in the design, supervision, and maintenance of electrical wiring and outlets, phone lines, phone equipment, hardware and software for phone, electrical and fire smoke detection equipment, for or through the Department of Corrections and by its phone system vendors for inmates, and other wiring and Code violations of state law and federal law, OSHA Requirements, Life Safety Code, NFPA 101, etc. and State Fire Marshall Requirements for inmates housed in prisons using prison provided phone, electrical devices and associated wiring and power sources, including smoke, fire alarms in inmate housing, sleeping areas

Negligent maintenance of the phones, phone and electrical wiring connected to and in the vicinity of the phone equipment that Mr. Stanley was using with permission of prison personnel.

Negligent and negligent per se violations of state and federal statutes, rules and regulations, *Ga. Comp. Rules & Regs., Georgia Department of Corrections*, OSHA regulations, regarding the training and supervision by guards of inmates, cruel and unusual punishment, failure to have fire, smoke alarms, routine ministerial inmate checks in their cells that allowed a phone system cart and devices to exist outside an inmate's cell after a fire for approximately six to nine hours after his clothing was set alight from an arc fire, electrocution, fire in his cell and after guards were alerted to the fire in Stanley's cell by other inmates.

Negligent failure to comply with Title II, of the American with Disabilities Act, for which the DOC has no immunity in law, to accommodate and provide care and plan for Mr. Stanley following his severe burns and amputations of both legs above his knees.

Negligent, negligent per se, deliberate, and intentional infliction of emotional distress by the Department of Corrections and its guards and employees who were aware, or should have been aware of Stanley's burns and fire in his cell caused by the phone system in violation of DOC policies and procedures and federal and state laws and regulations regarding fire, smoke alarms and warning devices, inspection and supervision of inmates duties, obligations set out as

Timothy C. Ward, Commissioner
Wade Damron, Director Risk Management Services Division
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ministerial duties in DOC policies and procedures and required by federal and state laws and regulations. The negligent, wilful, wanton, and intentional failure to obtain medical care and treatment for Stanley after he was burned in his cell for more than six to nine hours after the fire caused by the phone, electrical wiring and equipment provided for his use in his cell.

Negligent and negligent per se failures in training and supervising the prison guards whose duty it was to train, supervise guards and check on inmates on December 8, 2020 pursuant to prison policies and procedures, federal and state law rules and regulations, including in Building K2 in the cell where Stanley was housed that day prior to and after the fire in his cell, and his transfer by prison personnel after first discovering Stanley burned in his cell to the medical unit at the prison shortly before EMS personnel arrived at the prison medical unit at approximately 22:35 p.m. on December 8, 2020.

Negligence by prison personnel in sewing, altering, and making long johns or sleepwear for inmates from material provided or donated to the DOC without testing, or being aware of the dangerous flammability and danger of that material being made into human clothing, undergarments for inmates due to its high flammability characteristics.

Negligent and negligent per se conduct of DOC personnel in assessing a mentally disabled inmate, providing him appropriate prison assignments and counseling to enable him to deal with a long prison term as a mentally, cognitively disabled inmate.

Negligent failure to warn of the fire risk associated with the clothing the DOC provided and the fire risk from the phones provided to the inmates for their use by the DOC through Securus.

All claims for negligence and negligence per se for which there is a waiver of immunity under Georgia law that are presently known, and that may be discovered as evidence is uncovered in discovery by Mr. Stanley's counsel as discovery proceeds.

Conclusion

In addition plaintiff will seek claims against the DOC and its agents, employees for violation of his civil rights resulting in burns and injuries described above and as attached without cap of limitation, or without ante litem notice requirements, as provided by 42 U.S.C. 1981 et seq, 1983, 1988, including punitive damages against the guards who wilfully, wantonly, knowingly with conscious indifference to the consequences and intentionally failed to perform their ministerial duties as guards and obtain medical care, assistance for Stanley who was severely burned in his cell and waited to be discovered and provided medical care for a period of more than six hours.

Mr. Stanley will also seek damages and including failure to properly assess him, provide mental health counseling, care, etc. prior to the incident, after the incident, etc. as provided by

Timothy C. Ward, Commissioner
Wade Damron, Director Risk Management Services Division
The Honorable Christopher M. Carr, Attorney General
November 16, 2021
Page 6 of 6

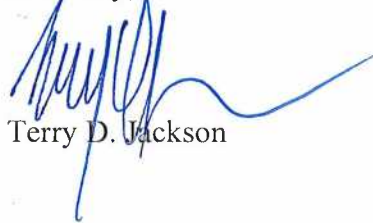
Title II of the Americans with Disabilities Act, that is not subject to ante litem provisions and for which sovereign immunity is waived as held by the U.S. Supreme Court.

Plaintiff will also seek claims against Securus, its contractors, subcontractors, etc., who hardwired and maintained the phone and electrical system to which the phone, cabling, wiring, etc., were installed, maintained, and repaired by Securus and its contractors, and any electrical and phone, smoke, fire alarm wiring contractors, subcontractors hired by the Georgia Department of Corrections and its prime contractors including Securus Technologies, LLC and Global*Tel for years prior to 2016.

Finally, a further purpose of this demand is to perfect a statutory pre-judgment interest demand as provided by O.C.G.A. § 51-12-14.

We look forward to your response accepting this *ante litem* notice demand within 90 days of your receipt of it as set out in the Georgia Tort Claims Act. If you have any questions, do not hesitate to contact me.

Sincerely,



Terry D. Jackson

TDJ/klh

Enclosures: CD with Exhibits

Exhibit 1 – Tattnall EMS Report

Exhibit 2 – Joseph M. Still Burn Center Certified Billing Records

cc: Susan Setterstrom (Via Email susan.setterstrom@doas.ga.gov & 1st Class U.S. Mail)
Jennifer Ammons (Via Email jennifer.ammons@gdc.ga.gov & 1st Class U.S. Mail)
Kathleen M. Pacious (Via Email kpacious@law.ga.gov & 1st Class U.S. Mail)



ORIGIN ID: QFEA (404) 659-2400
 KRISTI HOLTZBERG
 TERRY D. JACKSON, P.C.
 600 EDGEWOOD AVENUE SE

ATLANTA, GA 30312
 UNITED STATES US

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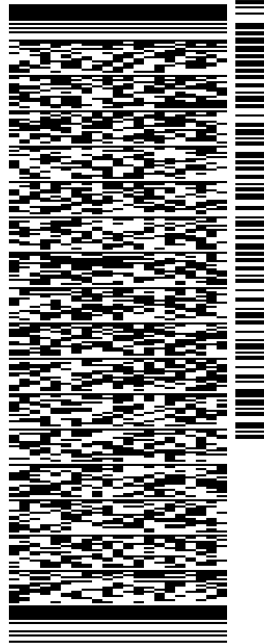
SUITE 543

ATLANTA GA 30334

(404) 656-4661

REF: STANLEY

INV: PO: DEPT:



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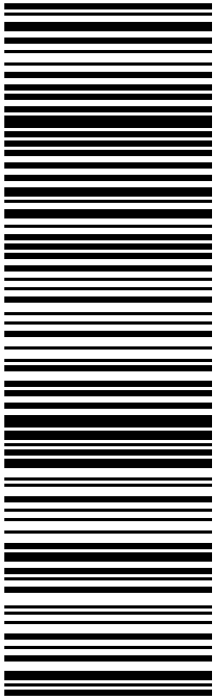
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TRACKING NUMBER [775208352878](#)

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600 Edgewood Avenue SE
Atlanta, GA, US, 30312

TO	GA Dept of Corrections Headquarters Timothy C. Ward, Commissioner 7 MLK Jr. Drive Suite 543 ATLANTA, GA, US, 30334
REFERENCE	Stanley
SHIPPER REFERENCE	Stanley
SHIP DATE	Tue 11/16/2021 02:18 PM
DELIVERED TO	Receptionist/Front Desk
PACKAGING TYPE	FedEx Envelope
ORIGIN	Atlanta, GA, US, 30312
DESTINATION	ATLANTA, GA, US, 30334
SPECIAL HANDLING	Deliver Weekday DSR
NUMBER OF PIECES	1
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SERVICE TYPE	FedEx Priority Overnight

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 KRISTI HOLTZBERG
 TERRY D. JACKSON, P.C.
 600 EDGEWOOD AVENUE SE

ATLANTA, GA 30312
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TO WADE DAMRON, DIRECTOR

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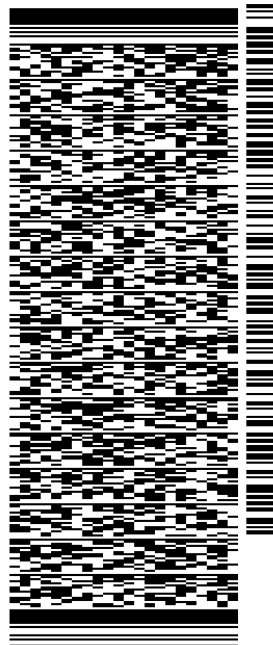
200 PIEDMONT AVENUE

SUITE 1208, WEST TOWER

ATLANTA GA 30334

(404) 463-7982 REF: STANLEY

INV: PO: DEPT:



J212221101801uv

56DJ29A7E/FE4A

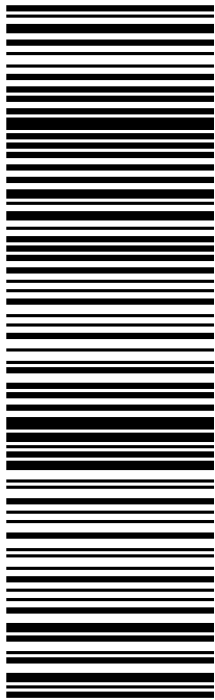
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Hi. Your package was
delivered Wed, 11/17/2021 at
9:53am.

Delivered to 2 MLK JR DR SE 1804, ATLANTA, GA 30334
Received by O.SLAYTON

OBTAIN PROOF OF DELIVERY

TRACKING NUMBER [775208380503](#)

FROM Terry D. Jackson, P.C.
600 Edgewood Avenue SE
Atlanta, GA, US, 30312

TO	GA Dept of Administrative Services Wade Damron, Director 200 Piedmont Avenue Suite 1208, West Tower ATLANTA, GA, US, 30334
REFERENCE	Stanley
SHIPPER REFERENCE	Stanley
SHIP DATE	Tue 11/16/2021 02:18 PM
DELIVERED TO	Receptionist/Front Desk
PACKAGING TYPE	FedEx Envelope
ORIGIN	Atlanta, GA, US, 30312
DESTINATION	ATLANTA, GA, US, 30334
SPECIAL HANDLING	Deliver Weekday DSR
NUMBER OF PIECES	1
TOTAL SHIPMENT WEIGHT	0.50 LB
SERVICE TYPE	FedEx Priority Overnight

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All weights are estimated.

To track the latest status of your shipment, click on the tracking number above.

Standard transit is the date and time the package is scheduled to be delivered by, based on the selected service, destination and ship date. Limitations and exceptions may apply. Please see the FedEx Service Guide for terms and conditions of service, including the FedEx Money-Back Guarantee, or contact your FedEx Customer Support representative.

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Thank you for your business.

ORIGIN ID: QFEA (404) 659-2400
 KRISTI HOLTZBERG
 TERRY D. JACKSON, P.C.
 600 EDGEWOOD AVENUE SE

SHIP DATE: 15NOV21
 ACTWGT: 0.50 LB
 CAD: 108066147/INET4400

ATLANTA, GA 30312
 UNITED STATES US

BILL SENDER

TO CHRISTOPHER CARR, ATTORNEY GENERAL

STATE OF GEORGIA

OFFICE OF THE ATTORNEY GENERAL

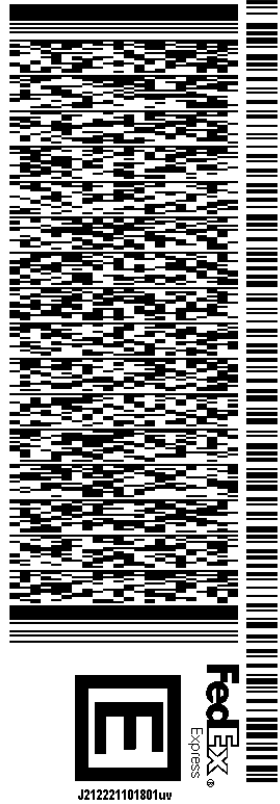
40 CAPITAL SQUARE, SW

ATLANTA GA 30334

(404) 656-3300

REF: STANLEY

INV: PO: DEPT:



56DJ29A7E/FE4A

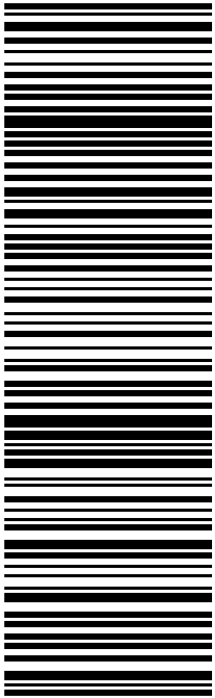
TRK# 7752 0843 0946
 0201

TUE - 16 NOV 11:30A
 PRIORITY OVERNIGHT

DSR

37 QFEA

GA-US ATL 30334



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

Subject: FedEx Shipment 775208430946: Your package has been delivered
Date: Wednesday, November 17, 2021 at 10:08:45 AM Eastern Standard Time
From: TrackingUpdates@fedex.com
To: Kristi Holtzberg

The FedEx logo is displayed in a blue serif font within a white rectangular box. The box is centered within a larger purple rectangular area.

Hi. Your package was
delivered Wed, 11/17/2021 at
10:04am.

Delivered to 40 CAPITOL SQ SW, ATLANTA, GA 30334
Received by C.ALICE

OBTAIN PROOF OF DELIVERY

TRACKING NUMBER [775208430946](#)

FROM Terry D. Jackson, P.C.
600 Edgewood Avenue SE
Atlanta, GA, US, 30312

TO	State of Georgia Christopher Carr, Attorney General Office of the Attorney General 40 Capital Square, SW ATLANTA, GA, US, 30334
REFERENCE	Stanley
SHIPPER REFERENCE	Stanley
SHIP DATE	Tue 11/16/2021 02:18 PM
DELIVERED TO	Receptionist/Front Desk
PACKAGING TYPE	FedEx Envelope
ORIGIN	Atlanta, GA, US, 30312
DESTINATION	ATLANTA, GA, US, 30334
SPECIAL HANDLING	Deliver Weekday DSR
NUMBER OF PIECES	1
TOTAL SHIPMENT WEIGHT	0.50 LB
SERVICE TYPE	FedEx Priority Overnight

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All weights are estimated.

To track the latest status of your shipment, click on the tracking number above.

Standard transit is the date and time the package is scheduled to be delivered by, based on the selected service, destination and ship date. Limitations and exceptions may apply. Please see the FedEx Service Guide for terms and conditions of service, including the FedEx Money-Back Guarantee, or contact your FedEx Customer Support representative.

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Thank you for your business.

EXHIBIT 3



Exhibit 3

EXHIBIT 4



Exhibit 4

EXHIBIT 5



Exhibit 5

EXHIBIT 6

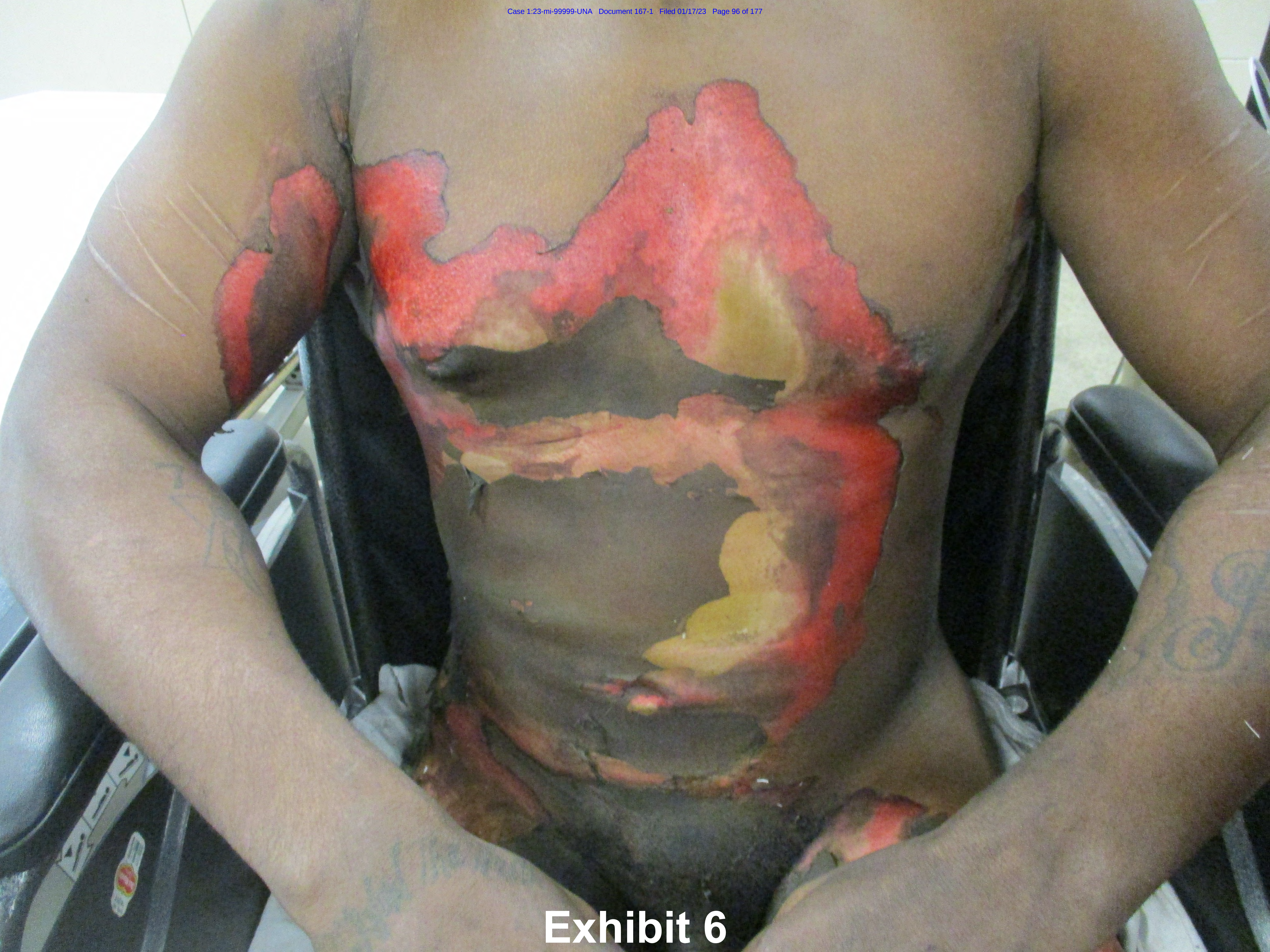


Exhibit 6

EXHIBIT 7



Exhibit 7

EXHIBIT 8



Exhibit 8

EXHIBIT 9



Exhibit 9

EXHIBIT 10



Exhibit 10

EXHIBIT 11



Exhibit 11

General Civil and Domestic Relations Case Filing Information Form

22-C-07110-S4

12/8/2022 3:42 PM

TIANA P. GARNER, CLERK

☐ Superior or ☒ State Court of Gwinnett State Court County

For Clerk Use Only

22-C-07110-S4

Date Filed _____
MM-DD-YYYY

Case Number _____

Plaintiff(s)

Stanley, Edward L

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Defendant(s)

Securus Technologies, LLC

Last First Middle I. Suffix Prefix

Stanley, Alvin L

Last First Middle I. Suffix Prefix

Independent Technologies, LLC d/b/a Wintel Phones,

Last First Middle I. Suffix Prefix

Georgia Department of Corrections

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Terry D. JacksonState Bar Number 386033Self-Represented ☐

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contempt/Modification/Other
Post-Judgment
☐ Contract
☐ Garnishment
☒ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Contempt
☐ Non-payment of child support,
medical support, or alimony
☐ Dissolution/Divorce/Separate
Maintenance/Alimony
☐ Family Violence Petition
☐ Modification
☐ Custody/Parenting Time/Visitation
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

- ☐ Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in OCGA § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

SECURUS TECHNOLOGIES, LLC,)

22-C-07110-S4

A Delaware Limited Liability)

No. _____

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

capacity,)

MARJORIE GLOVER,)

Individually and in her official)

capacity,)

CORY OSBORNE,)
Individually and in his official)
capacity,)
KIARA CAIN,)
Individually and in her official)
capacity,)
CHRIS TARVER,)
Individually and in his official)
capacity,)
SHAYLA McLAIN,)
Individually and in her official)
capacity,)
BARNARD FLORENCE,)
Individually and in his official)
capacity,)
ALYSSA SINGER,)
Individually and in her official)
capacity,)
CHRISTOPHER L. BURKHALTER,)
Individually and in his official)
capacity,)
HEATHER FLOWERS,)
Individually and in her official)
capacity,)
EDWARD ROOKS,)
Individually and in his official)
capacity,)
STEVE GRINER,)
Individually and in his official)
capacity,)
NIKILA BRACK,)
Individually and in her official)
capacity,)
ANGELA FASHANT,)
Individually and in her official)
capacity,)
SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW plaintiff and respectfully requests that the Court appoint the following private process server to serve Defendants in the above-styled matter:

1.

Glenn Christian
COASTAL INVESTIGATIONS
139 Live Oak Circle
Pembroke, GA 31321-4733
Telephone: (912) 653-6290

Mr. Glenn Christian is a private process server who is a private process server, over the age of 18, a U.S. citizen, and is of sound mind and body. He has previously served complaints and summons for counsel for plaintiff and various other law firms. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party, and not a convicted felon. He has no financial interest in the outcome of this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation. Attached to this motion is a proposed Order for the Court's signature and an affidavit of

plaintiff's counsel stating that Mr. Christian has previously served lawsuits on behalf of plaintiff's counsel and other law firms.

WHEREFORE plaintiff respectfully requests that the Court appoint Mr. Christian to serve the complaint and summons on Defendants in the above-styled matter.

Dated: December 8, 2022.

RESPECTFULLY SUBMITTED,

**COUNSEL FOR PLAINTIFF
EDWARD LEWIS STANLEY:**

By: /s/ Terry D. Jackson
TERRY D. JACKSON
Georgia Bar No. 386033



"We Know Trucks"
www.terryjacksonlaw.com

TERRY D. JACKSON, P.C.
600 Edgewood Avenue
Atlanta, Georgia 30312
(404) 216-5312 cell
(404) 659-2400 office
(404) 659-2414 fax
terry@terryjacksonlaw.com

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

No. _____

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

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TIMOTHY C. WARD,)

Individually and in his official)

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TREVONZA BOBBITT,)

Individually and in his official)

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Individually and in her official)

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capacity,)
ANGELA FASHANT,)
Individually and in her official)
capacity,)
SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

**AFFIDAVIT OF GLENN CHRISTIAN IN SUPPORT OF APPOINTMENT
OF PRIVATE PROCESS SERVER**

Personally appeared before the undersigned officer duly authorized to administer oaths, Glenn Christian, who after first being duly sworn, states and deposes as follows:

1. My name is Glenn Christian, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.
2. I am employed as a private process server at Coastal Investigations, I am over the age of 18, a U.S. citizen, and of sound mind and body. I am appointed by the Chatham County Superior and State Courts to serve complaints and summons, and I have previously served complaints and summons for various law firms, including for Mr. Jackson's firm. I am not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party, I have no financial interest in the outcome of this litigation, and I am wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.

3. I file this affidavit in support of Mr. Terry Jackson's motion to appoint me to serve civil process in the above styled lawsuit.

FURTHER AFFIANT SAITH NOT.



Glenn Christian

COASTAL INVESTIGATIONS, LLC

Investigations Division
139 Live Oak Circle
Pembroke, GA 31321-4733

Sworn to and subscribed before me
this 8 day of DEC, 2022.

Notary Public
My Commission Expires:



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

No. _____

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

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Individually and in her official)

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SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

**AFFIDAVIT OF COUNSEL FOR APPOINTMENT OF PRIVATE
PROCESS SERVER GLENN CHRISTIAN**

Personally appeared before the undersigned officer duly authorized to administer oaths, Terry D. Jackson, who after first being duly sworn, states and deposes as follows:

1. My name is Terry D. Jackson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.
2. I have filed a motion with this Court requesting that it appoint Glenn Christian, a private process server, as a special agent for service of process on Defendants in the above-styled matter.
3. Mr. Christian is over the age of 18, a U.S. citizen, and is of sound mind and body. He is employed at Coastal Investigations. He has previously served complaints and summons for various law firms.
4. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party. He has no financial interest in the outcome of

this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.

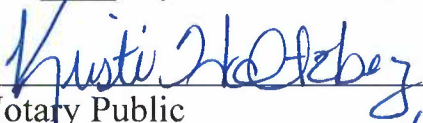
5. Counsel respectfully requests that this honorable Court appoint Mr. Glenn Christian as a special agent for service of process in this case.

FURTHER AFFIANT SAITH NOT.



TERRY D. JACKSON
Georgia Bar No. 386033

Sworn to and subscribed before me
this 8th day of December, 2022.



Notary Public
My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

No. _____

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

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Individually and in his official)
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)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

**AFFIDAVIT OF COUNSEL FOR APPOINTMENT OF PRIVATE
PROCESS SERVER GLENN CHRISTIAN**

Personally appeared before the undersigned officer duly authorized to administer oaths, Terry D. Jackson, who after first being duly sworn, states and deposes as follows:

1. My name is Terry D. Jackson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.

2. I have filed a motion with this Court requesting that it appoint Glenn Christian, a private process server, as a special agent for service of process on Defendants in the above-styled matter.

3. Mr. Christian is over the age of 18, a U.S. citizen, and is of sound mind and body. He is employed at Coastal Investigations. He has previously served complaints and summons for various law firms.

4. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party. He has no financial interest in the outcome of

this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.

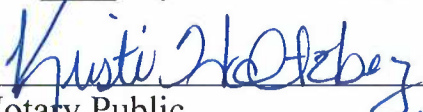
5. Counsel respectfully requests that this honorable Court appoint Mr. Glenn Christian as a special agent for service of process in this case.

FURTHER AFFIANT SAITH NOT.



TERRY D. JACKSON
Georgia Bar No. 386033

Sworn to and subscribed before me
this 8th day of December, 2022.


Notary Public
My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

No. 22-C-07110-S4**JURY TRIAL DEMANDED**

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

capacity,)

MARJORIE GLOVER,)

Individually and in her official)

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capacity,)
SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

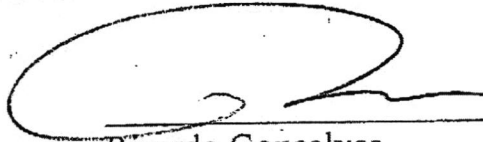
AFFIDAVIT OF RICARDO GONCALVES IN SUPPORT OF
APPOINTMENT OF PRIVATE PROCESS SERVER

Personally appeared before the undersigned officer duly authorized to administer oaths, Ricardo Goncalves, who after first being duly sworn, states and deposes as follows:

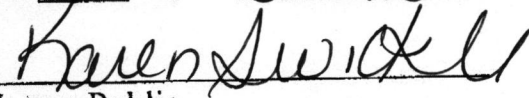
1. My name is Ricardo Goncalves, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.
2. I am employed as a private process server at J&K Investigative Services, I am over the age of 18, a U.S. citizen, and of sound mind and body. I have previously served complaints and summons for various law firms. I am not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party, I have no financial interest in the outcome of this litigation, and I am wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.

3. I file this affidavit in support of Mr. Terry Jackson's motion to appoint me to serve civil process in the above styled lawsuit.

FURTHER AFFIANT SAITH NOT.


Ricardo Goncalves

Sworn to and subscribed before me
this 8 day of December, 2022.


Notary Public

My Commission Expires:

KAREN SWICKLE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 10/11/2023

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action No. 22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

capacity,)

MARJORIE GLOVER,)

Individually and in her official)

capacity,)

CORY OSBORNE,)
Individually and in his official)
capacity,)
KIARA CAIN,)
Individually and in her official)
capacity,)
CHRIS TARVER,)
Individually and in his official)
capacity,)
SHAYLA McLAIN,)
Individually and in her official)
capacity,)
BARNARD FLORENCE,)
Individually and in his official)
capacity,)
ALYSSA SINGER,)
Individually and in her official)
capacity,)
CHRISTOPHER L. BURKHALTER,)
Individually and in his official)
capacity,)
HEATHER FLOWERS,)
Individually and in her official)
capacity,)
EDWARD ROOKS,)
Individually and in his official)
capacity,)
STEVE GRINER,)
Individually and in his official)
capacity,)
NIKILA BRACK,)
Individually and in her official)
capacity,)
ANGELA FASHANT,)
Individually and in her official)
capacity,)
SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

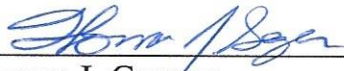
**AFFIDAVIT OF THOMAS J. GORGEN IN SUPPORT OF APPOINTMENT
OF PRIVATE PROCESS SERVER**

Personally appeared before the undersigned officer duly authorized to administer oaths, Thomas J. Gorgen, who after first being duly sworn, states and deposes as follows:

1. My name is Thomas J. Gorgen, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.
2. I am employed as a private process server at Gorgen Detective Agency, L.L.C., I am over the age of 18, a U.S. citizen, and of sound mind and body. I have previously served complaints and summons for various law firms. I am not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party, I have no financial interest in the outcome of this litigation, and I am wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.


3. I file this affidavit in support of Mr. Terry Jackson's motion to appoint me to serve civil process in the above styled lawsuit.

FURTHER AFFIANT SAITH NOT.

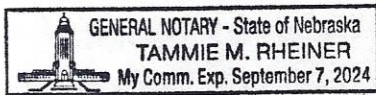


Thomas J. Gorgen

Sworn to and subscribed before me
this 12 day of DECEMBER, 2022.



Notary Public
My Commission Expires:



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

No. 22-C-0711-S4

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

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Individually and in his official)

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SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

AFFIDAVIT OF SERVICE OF JEROY ROBINSON

Personally appeared before the undersigned officer duly authorized to administer oaths, Jeroy Robinson who after first being duly sworn, states and deposes as follows:

1. My name is Jeroy Robinson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.

2. On December 9, 2022 at approximately 12:30 p.m., I served a copy of the following items:

- A. Summons;
- B. Complaint for Damages;
- C. Motion for Appointment of Private Process Server with Affidavits of Terry D. Jackson and Glenn Christian; and
- D. Proposed Order re: Motion for Appointment of Private Process Server

in the above-styled matter to Wade Damron, Director Risk Management Services Division, Georgia Department of Administrative Services, at the following address:

Wade Damron, Director Risk Management Services Division
Georgia Department of Administrative Services
200 Piedmont Avenue SE, Suite 1220 West Tower
Atlanta, GA 30334

2. Said documents were served by handing the same **personally** to Quinette Freeman, Administrative Assistant to Wade Damron, who accepted those documents on behalf of Wade Damron, Director Risk Management Services Division, Georgia Department of Administrative Services, and stated that she was authorized to do so.

FURTHER AFFIANT SAITH NOT.


Jeroy Robinson

Sworn to and subscribed before me
this 9th day of December, 2022.


Notary Public

My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

No. 22-C-0711-S4

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

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MARJORIE GLOVER,)

Individually and in her official)

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CORY OSBORNE,)

Individually and in his official)

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SLOBODAN POPOVIC,)
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BOBBY FIGUEROA,)
Individually and in his official)
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And,)
)
JOHN & JANE DOE individuals &)

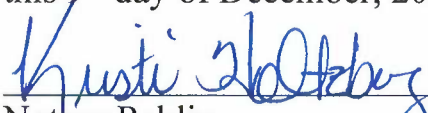
2. Said documents were served by handing the same **personally** to Linda Banks, who accepted those documents on behalf of C T Corporation System and Securus Technologies, LLC at that address.

FURTHER AFFIANT SAITH NOT



Jeroy Robinson

Sworn to and subscribed before me
this 9th day of December, 2022.



Notary Public
My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

No. 22-C-0711-S4

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

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BOBBY FIGUEROA,)

Individually and in his official)
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And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

AFFIDAVIT OF SERVICE OF JEROY ROBINSON

Personally appeared before the undersigned officer duly authorized to administer oaths, Jeroy Robinson who after first being duly sworn, states and deposes as follows:

1. My name is Jeroy Robinson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.

2. On December 9, 2022 at approximately 12:50 p.m., I served a copy of the following items:


- A. Summons;
- B. Complaint for Damages;
- C. Motion for Appointment of Private Process Server with Affidavits of Terry D. Jackson and Glenn Christian; and
- D. Proposed Order re: Motion for Appointment of Private Process Server

in the above-styled matter to Timothy C. Ward, Commissioner of the Georgia Department of Corrections, at the following address:


Timothy C. Ward, Commissioner
Georgia Department of Corrections, Headquarters
7 MLK Jr. Drive, Suite 543
Atlanta, GA 30334

2. Said documents were served by handing the same **personally** to Rob Thrower, Administrative Assistant to Timothy C. Ward, who accepted those documents on behalf of Timothy C. Ward, Commissioner of the Georgia Department of Corrections, and stated that he was authorized to do so.

FURTHER AFFIANT SAITH NOT.


Jeroy Robinson

Sworn to and subscribed before me
this 9th day of December, 2022.


Notary Public
My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action No. 22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

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MARJORIE GLOVER,)

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Individually and in his official)
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KIARA CAIN,)
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BARNARD FLORENCE,)
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CHRISTOPHER L. BURKHALTER,)
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HEATHER FLOWERS,)
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SLOBODAN POPOVIC,)
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capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

**AFFIDAVIT OF COUNSEL FOR APPOINTMENT OF PRIVATE
PROCESS SERVER RICARDO GONCALVES**

Personally appeared before the undersigned officer duly authorized to administer oaths, Terry D. Jackson, who after first being duly sworn, states and deposes as follows:

1. My name is Terry D. Jackson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.

2. I have filed a motion with this Court requesting that it appoint Ricardo Goncalves, a private process server, as a special agent for service of process on Defendants in the above-styled matter.

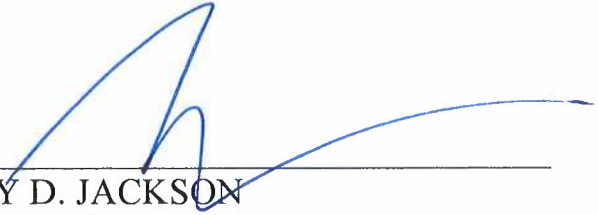
3. Mr. Goncalves is over the age of 18, a U.S. citizen, and is of sound mind and body. He is employed at J&K Investigations. He has previously served complaints and summons for various law firms.

4. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party. He has no financial interest in the outcome of

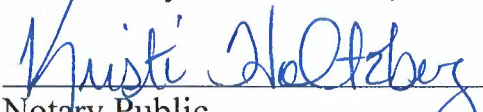
this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.

5. Counsel respectfully requests that this honorable Court appoint Mr. Ricardo Goncalves as a special agent for service of process in this case.

FURTHER AFFIANT SAITH NOT.


TERRY D. JACKSON
Georgia Bar No. 386033

Sworn to and subscribed before me
this 13th day of December, 2022.


Notary Public
My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action No. 22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

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TREVONZA BOBBITT,)

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Individually and in her official)

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SLOBODAN POPOVIC,)
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capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

**AFFIDAVIT OF COUNSEL FOR APPOINTMENT OF PRIVATE
PROCESS SERVER RICARDO GONCALVES**

Personally appeared before the undersigned officer duly authorized to administer oaths, Terry D. Jackson, who after first being duly sworn, states and deposes as follows:

1. My name is Terry D. Jackson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.

2. I have filed a motion with this Court requesting that it appoint Ricardo Goncalves, a private process server, as a special agent for service of process on Defendants in the above-styled matter.

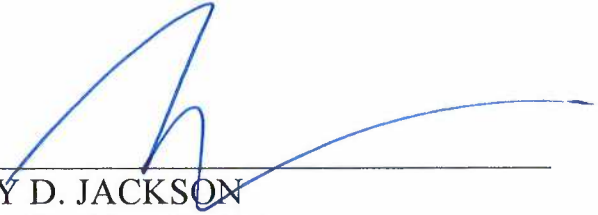
3. Mr. Goncalves is over the age of 18, a U.S. citizen, and is of sound mind and body. He is employed at J&K Investigations. He has previously served complaints and summons for various law firms.

4. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party. He has no financial interest in the outcome of

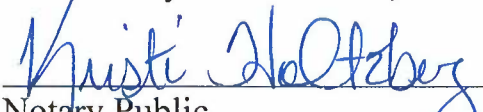
this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.

5. Counsel respectfully requests that this honorable Court appoint Mr. Ricardo Goncalves as a special agent for service of process in this case.

FURTHER AFFIANT SAITH NOT.


TERRY D. JACKSON
Georgia Bar No. 386033

Sworn to and subscribed before me
this 13th day of December, 2022.


Notary Public
My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action No. 22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

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Individually and in his official)
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And,)
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JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

**AFFIDAVIT OF COUNSEL FOR APPOINTMENT OF PRIVATE
PROCESS SERVER THOMAS J. GORGEN**

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1. My name is Terry D. Jackson, I am of legal age, sound mind and am otherwise competent to make this affidavit. The matters stated herein are within my personal knowledge and I know them to be true and correct.
2. I have filed a motion with this Court requesting that it appoint Thomas J. Gorgen, a private process server, as a special agent for service of process on Defendants in the above-styled matter.
3. Mr. Gorgen is over the age of 18, a U.S. citizen, and is of sound mind and body. He is employed at Gorgen Detective Agency, L.L.C. He has previously served complaints and summons for various law firms.
4. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party. He has no financial interest in the outcome of

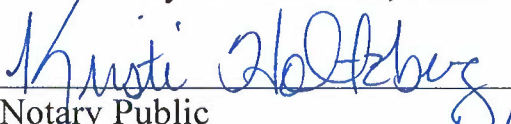
this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation.

5. Counsel respectfully requests that this honorable Court appoint Mr. Thomas J. Gorgen as a special agent for service of process in this case.

FURTHER AFFIANT SAITH NOT.


TERRY D. JACKSON
Georgia Bar No. 386033

Sworn to and subscribed before me
this 13th day of December, 2022.


Notary Public
My Commission Expires: 10/11/2026



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action No. 22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

capacity,)

TREVONZA BOBBITT,)

Individually and in his official)

capacity,)

VIKKI IRWIN,)

Individually and in her official)

capacity,)

MARJORIE GLOVER,)

Individually and in her official)

capacity,)

CORY OSBORNE,)
Individually and in his official)
capacity,)
KIARA CAIN,)
Individually and in her official)
capacity,)
CHRIS TARVER,)
Individually and in his official)
capacity,)
SHAYLA McLAIN,)
Individually and in her official)
capacity,)
BARNARD FLORENCE,)
Individually and in his official)
capacity,)
ALYSSA SINGER,)
Individually and in her official)
capacity,)
CHRISTOPHER L. BURKHALTER,)
Individually and in his official)
capacity,)
HEATHER FLOWERS,)
Individually and in her official)
capacity,)
EDWARD ROOKS,)
Individually and in his official)
capacity,)
STEVE GRINER,)
Individually and in his official)
capacity,)
NIKILA BRACK,)
Individually and in her official)
capacity,)
ANGELA FASHANT,)
Individually and in her official)
capacity,)
SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW plaintiff and respectfully requests that the Court appoint the following private process server to serve Defendants in the above-styled matter:

1.

Ricardo Goncalves
J&K Investigative Services
147 Taylor Avenue
Hillsborough Township, NJ 08844
Telephone: (908) 707-1900

Mr. Ricardo Goncalves is a private process server, over the age of 18, a U.S. citizen, and is of sound mind and body. He has previously served complaints and summons for various law firms. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party, and not a convicted felon. He has no financial interest in the outcome of this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation. Attached to this motion is a proposed Order for the Court's signature

and an affidavit of plaintiff's counsel stating that Mr. Goncalves has previously served lawsuits on behalf of other law firms.

WHEREFORE plaintiff respectfully requests that the Court appoint Mr. Goncalves to serve the complaint and summons on Defendants in the above-styled matter.

Dated: December 13, 2022.

RESPECTFULLY SUBMITTED,

**COUNSEL FOR PLAINTIFF
EDWARD LEWIS STANLEY:**

By: /s/ Terry D. Jackson
TERRY D. JACKSON
Georgia Bar No. 386033



"We Know Trucks"

www.terryjacksonlaw.com

TERRY D. JACKSON, P.C.
600 Edgewood Avenue
Atlanta, Georgia 30312
(404) 216-5312 cell
(404) 659-2400 office
(404) 659-2414 fax
terry@terryjacksonlaw.com

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action No. 22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

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TREVONZA BOBBITT,)

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SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW plaintiff and respectfully requests that the Court appoint the following private process server to serve Defendants in the above-styled matter:

1.

Thomas J. Gorgen
Gorgen Detective Agency, L.L.C.
2614 North 161 Avenue
Omaha, Nebraska 68114
Telephone: (402) 571-9574

Mr. Thomas J. Gorgen is a private process server, over the age of 18, a U.S. citizen, and is of sound mind and body. He has previously served complaints and summons for various law firms. He is not a party, relative to a party, or related to any attorney in this matter, not an attorney of any party, and not a convicted felon. He has no financial interest in the outcome of this litigation, and he is wholly disinterested as a person, directly or indirectly, to the outcome of this case or litigation. Attached to this motion is a proposed Order for the Court's signature

and an affidavit of plaintiff's counsel stating that Mr. Gorgen has previously served lawsuits on behalf of other law firms.

WHEREFORE plaintiff respectfully requests that the Court appoint Mr. Gorgen to serve the complaint and summons on Defendants in the above-styled matter.

Dated: December 13, 2022.

RESPECTFULLY SUBMITTED,

**COUNSEL FOR PLAINTIFF
EDWARD LEWIS STANLEY:**

By: /s/ Terry D. Jackson
TERRY D. JACKSON
Georgia Bar No. 386033



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(404) 659-2400 office
(404) 659-2414 fax
terry@terryjacksonlaw.com

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

No. 22-C-07110-S4**JURY TRIAL DEMANDED**

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

CORRECTIONS,)

TIMOTHY C. WARD,)

Individually and in his official)

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TREVONZA BOBBITT,)

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SLOBODAN POPOVIC,)
Individually and in his official)
capacity,)
BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

ORDER

The Court having read and considered plaintiff's motion to appoint a private process server, does hereby appoint Glenn Christian as a special agent for service of process on Defendants in the above-styled matter.

IT IS HEREBY ORDERED.

This 13th day of Dec, 2022.


Judge Ronda Colvin Leary
Gwinnett County State Court

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)

Plaintiff,)

v.)

Civil Action No. 22-C-07110-S4

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

ALVIN L. STANLEY, individually)

and as an agent and employee of)

SECURUS TECHNOLOGIES, LLC,)

A Delaware Limited Liability)

Company,)

JURY TRIAL DEMANDED

INDEPENDENT TECHNOLOGIES,)

LLC, a Nebraska Limited Liability)

Company, d/b/a Wintel Phones,)

DATAONLINE, LLC, a New Jersey)

Limited Liability Company, D/B/A,)

ANOVA,)

GEORGIA DEPARTMENT OF)

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BOBBY FIGUEROA,)

Individually and in his official)
capacity,)
)
And,)
)
JOHN & JANE DOE individuals &)
Entities (1-5),)
)
Defendants.)

NOTICE OF FILING AFFIDAVITS OF SERVICE

COME NOW Plaintiffs and file the following Affidavits of Service:

1. Affidavit of Service of Jeroy Robinson for service on Securus Technologies, LLC on December 9, 2022;
2. Affidavit of Service of Jeroy Robinson for service on Timothy C. Ward, Commissioner, Georgia Department of Corrections, on December 9, 2022;
and
3. Affidavit of Service of Jeroy Robinson for service on Wade Damron, Director Risk Management Services Division, Georgia Department of Administrative Services on December 9, 2022.

Attached hereto at Exhibit 1 is the Order of Appointment for Mr. Robinson.

Dated: December 13, 2022.

RESPECTFULLY SUBMITTED,

**COUNSEL FOR PLAINTIFF
EDWARD LEWIS STANLEY:**

By: /s/ Terry D. Jackson
TERRY D. JACKSON
Georgia Bar No. 386033



"We Know Trucks"

www.terryjacksonlaw.com

TERRY D. JACKSON, P.C.
600 Edgewood Avenue
Atlanta, Georgia 30312
(404) 216-5312 cell
(404) 659-2400 office
(404) 659-2414 fax
terry@terryjacksonlaw.com

EXHIBIT 1

FILED IN OFFICE
CLERK STATE COURT
GWINNETT COUNTY, GA

IN THE STATE COURT OF GWINNETT COUNTY

2022 JAN -3 PM 4:21

STATE OF GEORGIA

TIANA P. GARNER, CLERK

IN RE: Permanent Process Servers

Case Number:

21 C 08810-6

ORDER OF APPOINTMENT

The application of the undersigned permanent process server having been read and considered, said applicant is hereby appointed permanent process server of this court pursuant to O.C.G.A. § 9-11-4(c), from the date of this order **up to and including January 4, 2023.**

This order allows the applicant to serve as a process server in Gwinnett County State Court matters only, on an annual renewable basis.

SO ORDERED this 3rd day of January, 2022

Veronica Cope

Veronica Cope (Dec 30, 2021 19:10 EST)

Presiding Judge
Gwinnett County State Court

Applicant:

Name

Jeroy Robinson

Address

105 IVER PLACE Apt #400
Fayetteville, GA 30214
404-580-0870

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDWARD LEWIS STANLEY,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 22-C-07110-S4
SECURUS TECHNOLOGIES, LLC,)	
ET AL.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the within and foregoing **NOTICE OF FILING AFFIDAVITS OF SERVICE** upon the parties by placing same in a properly addressed envelope with adequate postage affixed thereon via First Class U.S. Mail, e-filing, or by hand delivery as directed by the Court to:

Securus Technologies, LLC
c/o CT Corporation System, Registered Agent
289 S. Culver Street
Lawrenceville, GA 30046

Timothy C. Ward, Commissioner
Georgia Department of Corrections, Headquarters
7 MLK Jr. Drive, Suite 543
Atlanta, GA 30334

Wade Damron, Director Risk Management Services Division
Georgia Department of Administrative Services
200 Piedmont Avenue SE, Suite 1220 West Tower
Atlanta, GA 30334

Christopher M. Carr, Attorney General
State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334

Timothy C. Ward
300 Southern Walk Drive
Milledgeville, GA 31061

Trevonza Bobbitt
427 1st Avenue South
Reidsville, GA 30453

Vikki Irwin
25 1st Avenue South
Reidsville, GA 30453

Marjorie Glover
1421 Peachtree Road
Reidsville, GA 30453

Cory Osborne
98 Oak Avenue
Reidsville, GA 30453

Kiara Cain
114 ½ South Baker Street
Glennville, GA 30427

Shayla McLain
93 3rd Avenue West
Reidsville, GA 30453

Angela Fashant
122 3rd Avenue West
Reidsville, GA 30453

Slobodan Popovic
427 Auburn Road
Glennville, GA 30427

Barnard Florence
12800 Burkhalter Road
Statesboro, GA 30461

Nikila Brack
305 Hodges Circle
Statesboro, GA 30458

Chris Tarver
145 Peachtree Street
Swainsboro, GA 30401

Alyssa Singer
2096 GA Highway 192 North
Midville, GA 30441-4502

Christopher L. Burkhalter
2606 Marshall Avenue
Savannah, GA 31405

Heather Flowers
485 Regency Road
Vidalia, GA 30474

Edward Rooks
969 Hatch Parkway North
Baxley, GA 31513

Steve Griner
111 Lakeview Drive
Sandersville, GA 31082

Bobby Figueroa
554 Oak Ridge Road
Soperton, GA 30457

Dated: December 13, 2022.

RESPECTFULLY SUBMITTED,

**COUNSEL FOR PLAINTIFF
EDWARD LEWIS STANLEY:**

By: /s/ Terry D. Jackson
TERRY D. JACKSON
Georgia Bar No. 386033



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terry@terryjacksonlaw.com

22-C-07110-S4

12/21/2022 12:26 PM

JIANA P. GARNER, CLERK

Civil Action No. 22-C-07110-S4Date Filed December 8, 2022State Court
Magistrate Court
Georgia, ~~DeKalb~~ County
Treutlen

Attorney's Address

Terry D. Jackson, P.C.
600 Edgewood Avenue
Atlanta, GA 30312
terry@terryjacksonlaw.comEdward Lewis Stanley

Plaintiff

VS.

Securus Technologies LLC et al.

Defendant

Name and Address of Party to be Served

Bobby Figueroa
554 Oak Ridge Road
Soperton, GA 30457

Garnishee

MARSHAL/SHERIFF'S ENTRY OF SERVICE

PERSONAL

☒ I have this day served the defendant BOBBY FIGUEROA personally with a copy of the within action and summons.

RESIDENCE

☐ I have this day served the defendant _____ by leaving a copy of the action and summons at (his/her) dwelling house or usual place of abode with a person of suitable age and discretion residing therein; delivered same into the hands of _____ described as follows: age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

☐ Served the defendant _____ by leaving a copy of the within action and summons with _____ in charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

☐ Diligent search made and defendant not to be found in the jurisdiction of this Court.This 13th day of DEC, 2022.[Signature]
Deputy